

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: December 29, 2006

ANALYST: Kristin DeCarmine

- I. COMMITTEE: Democratic Party of Oklahoma
(C00190934)
Nina Ritchie, Treasurer (5/24/05- Present)
Debbie Hogue -Downing (11/17/1997-5/23/05)
4100 North Lincoln Blvd.
Oklahoma City, OK 73105
- II. RELEVANT STATUTE: 2 U.S.C. § 434 (b)(2)(A)
2 U.S.C. § 434 (b)(2)(D)
2 U.S.C. § 434 (b)(2)(J)
2 U.S.C. § 434 (b)(8)
11 C.F.R. § 104.3 (a)(2)(i)(A) and (B)
11 C.F.R. § 104.3 (a)(2)(iii)
11 C.F.R. § 104.3 (a)(2)(viii)(A) and (B)
11 C.F.R. § 104.3 (d)
11 C.F.R. § 104.11(b)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

The Democratic Party of Oklahoma ("the Committee") filed an Amended 2004 12 Day Pre-General Report disclosing \$235,098.40 in additional receipts and an Amended 2004 30 Day Post-General Report disclosing \$320,233.56 in additional debts (Attachment 2).

2004 12 Day Pre-General Report

On October 21, 2004, the Committee filed its 2004 12 Day Pre-General Report covering the period from October 1, 2004 to October 13, 2004 (Image 24962678661). This original report disclosed \$900.00 in receipts on Line 11(a)(1) (Itemized Contributions From Individuals/Persons Other Than Political Committees), \$1,220.00 in receipts on Line

11(a)(ii) (Unitemized Contributions From Individuals/Persons Other Than Political Committees), \$0.00 in receipts on Line 11(c) (Contributions From Other Political Committees) and \$0.00 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 24962678663).

On March 8, 2005, the Committee filed an Amended 2004 12 Day Pre-General Report covering the period from October 1, 2004 to October 13, 2004 (Image 25990204080). This report disclosed \$11,400.00 in receipts on Line 11(a)(i) (Itemized Contributions From Individuals/Persons Other Than Political Committees), \$1,520.00 in receipts on Line 11(a)(ii) (Unitemized Contributions From Individuals/Persons Other Than Political Committees), \$30,000.00 in receipts on Line 11(c) (Contributions From Other Political Committees), and \$194,298.40 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 25990204082).

On March 23, 2005, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 12 Day Pre-General Report, received March 8, 2005. Among other matters, the RFAI sought clarification regarding the additional receipts that were not disclosed on the Committee's original 2004 12 Day Pre-General Report (Image 25038762577).

On April 22, 2005 the Committee filed another Amended 2004 12 Day Pre-General Report covering the period from October 1, 2004 to October 13, 2004 (Image 25990555535). This amended report disclosed no change to the amount of receipts reported by the Committee. The amended report did contain a memo text which stated in part, "High volume of transactions during campaign required mor [sic] time then [sic] anticipated. In effort to disclose accurately some items were inadvertently left undisclosed." (Image 25990555641)

On April 27, 2005 at 4:11 p.m., the Reports Analysis Division ("RAD") analyst left a voicemail message for Debbie Bruton, Committee Representative, regarding the Amended 2004 12 Day Pre-General Report, received March 8, 2005. The Analyst requested that Ms. Bruton call her back regarding an issue on the Amended 2004 12 Day Pre-General Report which was referable to the Office of General Counsel (OGC) (Attachment 3).

At 4:19 p.m on April 27, 2005, Donna Russell returned the RAD analyst's call and stated that she was now in charge of preparing the Committee's reports. Ms. Russell further clarified that Ms. Bruton no longer worked for the Committee. The Analyst explained that the Amended 2004 12 Day Pre-General Report, received March 8, 2005, disclosed an increase in receipts and that the matter was referable to the OGC. The Analyst advised the Committee to submit within one week any additional information as to why the Committee had not calculated the correct activity by the required reporting deadline (Attachment 3).

On June 3, 2005, the Committee filed another Amended 2004 12 Day Pre-General Report covering the reporting period from October 1, 2004 to October 13, 2004 (Image 25980533592). The amended report disclosed no change in the amount of receipts made by the Committee (Image 25980533594).

On January 24, 2006, the Committee filed another Amended 2004 12 Day Pre-General Report covering the period from October 1, 2004 to October 13, 2004 (Image 26990103144). The amended report disclosed no change in the amount of receipts made by the Committee (Image 26990103146).

On September 21, 2006, the RAD analyst called and left a voicemail message for Nina Ritchie, Committee Treasurer, regarding the Amended 2004 12 Day Pre-General and the Amended 2004 30 Day Post-General Reports. The Analyst stated that the Committee would be referred to the OGC regarding the increase in receipts and debts disclosed on the Committee's Amended 2004 12 Day Pre-General and Amended 2004 30 Day Post-General Reports. The Analyst highlighted that the Committee could submit, for the public record, an explanation regarding the increase in activity (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

2004 30 Day Post-General Report

On December 3, 2004, the Committee filed its 2004 30 Day Post-General Report covering the period from October 14, 2004 to November 22, 2004 (Image 24991474704). This original report disclosed \$103,310.51 on Line 10 (Debts and Obligations Owed BY The Committee) of the Summary Page (Image 24991474705).

On March 25, 2005, the Committee filed an Amended 2004 30 Day Post-General Report covering the period from October 14, 2004 to November 22, 2004 (Image 25990300054). The amended report disclosed no change in the amount of debt owed by the Committee (Image 25990300055).

On May 22, 2005, the Committee filed another Amended 2004 30 Day Post-General Report covering the period from October 14, 2004 to November 22, 2004 (Image 25990911437). The amended report disclosed no change in the amount of debt owed by the Committee (Image 25990911438).

On January 9, 2006, the Committee submitted a miscellaneous electronic submission (Form 99) to the Commission which stated "Debt and Expenditures of calendar years 2004 and 2005 are currently under extensive internal and external review. Please expect further amendments for the respective filing periods." (Image 26990034684)

On January 24, 2006, the Committee filed another Amended 2004 30 Day Post-General Report covering the period from October 14, 2004 to November 22, 2004 (Image 26990103287). The amended report disclosed \$423,544.07 in debts owed on Line 10 (Debts and Obligations owed By the Committee) of the Summary Page (Image 26990103288).

On March 8, 2006, an RFAI was sent to the Committee referencing the Amended 2004 30 Day Post-General Report, received January 24, 2006. The RFAI asked for

clarification regarding the additional debts on Line 10 that were not disclosed on the Committee's original 2004 30 Day Post-General Report (Image 26039011758).

On April 6, 2006, the Committee filed a miscellaneous electronic submission (Form 99) in response to the RFAI referencing the Amended 2004 30 Day Post-General Report which stated, "The Committee is in receipt of the Commission's letter regarding the 2004 Amended 30 Day Post-General Report filed on Jan. 24, 2006. After the 2004 election, the committee undertook a rigorous review of its financial activities during the 2004 election cycle. At the conclusion of the internal audit, the committee voluntarily filed comprehensive amendments to its reports to disclose debts owed by the Committee that were apparently omitted during the 2004 election cycle." (Image 26950021417)

On September 21, 2006, the RAD analyst called and left a voicemail message for Nina Ritchie, Committee Treasurer, regarding the Amended 2004 12 Day Pre-General and the Amended 2004 30 Day Post-General Reports. The Analyst stated that the Committee would be referred to the OGC regarding the increase in receipts and debts disclosed on the Committee's Amended 2004 12 Day Pre-General and Amended 2004 30 Day Post-General Reports. The Analyst highlighted that the Committee could submit, for the public record, an explanation regarding the increase in activity (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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DEMOCRATIC PARTY OF OKLAHOMA

NINA RITCHIE

FILING FREQUENCY MONTHLY

4100 North Lincoln Blvd

Oklahoma City

QUALIFIED
OK 73105

ID #C00190934

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY		
3	12G	N	P	10/26/2006	42	26950727759	10/01/2006 10/18/2006	878	88648	61230	28296	175216		
3	30G	N	P	12/07/2006	67	26940870189	10/19/2006 11/27/2006	28296	142803	128699	42400	163456		
												TOTAL	1165626	1123537

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Democratic Party of Oklahoma (C00190934)

**2004 12 Day Pre-General Report/Amended 2004 12 Day Pre-General Report
Overview of Additional Receipts**

Report Line	2004 12 Day Pre-General Report (Image 24962678663)	Amended 2004 12 Day Pre-General Report, received 1/24/06 (Image 26990103144)	Receipt Variance Amount
11(a)(i)	\$900.00	\$11,400.00	\$10,500.00
11(a)(ii)	\$1,220.00	\$1,520.00	\$300.00
11(c)	\$0.00	\$30,000	\$30,000
17	\$0.00	\$194,298.40	\$194,298.40
		TOTAL	\$235,098.40

**2004 30 Day Post-General Report/Amended 2004 30 Day Post-General Report
Overview of Additional Debts**

Report Line	2004 30 Day Post-General Report (Image 24991474705)	Amended 2004 30 Day Post-General Report, received 1/24/06 (Image 26990103288)	Debt Variance Amount
10	\$103,310.51	\$423,544.07	\$320,233.56

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